



The State of New Hampshire  
**Department of Environmental Services**



**Michael P. Nollin**  
Commissioner

September 13, 2004

Henry Kober, President  
DCI, Inc.  
265 South Main Street  
Lisbon, New Hampshire 03585

**CERTIFIED MAIL (7099 3400 0018 1290 3190)**  
**RETURN RECEIPT REQUESTED**  
**LETTER OF DEFICIENCY**  
**No. ARD 2004-006**

Dear Mr. Kober:

The New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection on September 11, 2003, of DCI, Inc., located in Lisbon ("the Company"). The purpose of the inspection was to evaluate the Company's compliance status with the N.H. Code of Admin. Rules Env-A 100, *et seq.*, and State Permit # FP-S-0079 ("the Permit"). The Permit was issued to the Company on January 29, 1999.

This Letter of Deficiency ("LOD") is being sent to formally notify you of the deficiencies identified as a result of the inspection and subsequent file review and the necessary action that must be taken to resolve them. The deficiencies are as follows:

1. RSA 125-C:11 and Env-A 607.01 require the owner or operator of a source of air pollutants to obtain a temporary permit prior to the construction or installation of a source or device if that source or device is listed in Env-A 607.01. At the time of the inspection, the Company had partially installed two 500 KW diesel-powered generators. The generators in question are identified in Env-A 607.01(d), so temporary permits were required prior to installation. The Company did not apply for a temporary permit for either generator.
2. Condition VII.A.6. of the Permit, requires that the Company keep an operating log for the emergency generator, including dates and hours of operation. The September 11, 2003, inspection revealed that the Company is violating this permit condition by not keeping such a log.
3. Condition III.D. of the Permit, requires the Company to use clean scrap wood products from the manufacturing process in the Industrial and Dillon Boilers. DES discovered during the September 11, 2003 inspection that the Company has been using plywood and particleboard as fuel in the boilers.
4. Env-A 1604 requires documentation of the sulfur content of the #2 fuel oil used at the facility. DES discovered during the September 11, 2003 inspection that the Company has not been documenting sulfur content of its fuel.

5. Condition III.C. of the Permit, requires the Company to notify DES of any fuel change. The Company changed from #4 fuel oil to #2 fuel oil in the Superior boiler without notifying DES, and used an unapproved wood, maple, in the Industrial and Dillon boilers.
6. Env-A 908 requires a facility that emits more than 10 tons of volatile organic compounds (VOCs) in a year to report such emissions to DES. The Company failed to submit annual VOC emissions statements for 1998 – 2000, during which time actual VOC emissions exceeded 10 tons per year.
7. Condition VII.A. of the Permit requires the Company to keep monthly totals of VOC and HAP emissions and scrap wood usage, as well as daily feed water rates and an operating log for the emergency generator. The September 11, 2003 inspection revealed that such records were not being kept.
8. Condition VII.B. of the Permit requires the Company to submit quarterly reports of the information required to be recorded pursuant to Condition VII.A. Such reports had not been submitted as of September 11, 2003.
9. Env-A 1406 required the Company to conduct a toxics review to determine compliance with Env-A 1400 by May 8, 2001. Such a review was not conducted by the Company by that date.
10. Env-A 704 (recently renumbered 705) requires permitted facilities to pay fees based on their annual emissions. The Company violated Env-A 704 by not paying emission fees by October 15 of the following year for the years 1998, 1999, 2000, and 2001.

Of the above-referenced deficiencies, items #1-#4 are still unresolved. They can be resolved by the Company taking the following actions within 60 days from the date of this letter:

1. Submit applications for temporary permits for two partially installed 500 KW diesel-powered generators. In the alternative, remove the generators from their pads and submit documentation (pictures and affidavits) of the removals.
2. Prepare an operating log for the emergency generator and submit a copy of the first page to DES.
3. Submit an affidavit to DES describing the records the Company is keeping of its plywood and particleboard use and affirming that it will not exceed the following limits on such use: For the Dillon boiler, 2,650 tons/year of non-virgin wood; and for the Industrial Boiler, 9.2 tons/day and 830 tons/year of non-virgin wood.
4. Submit a copy of the most current #2 fuel oil delivery ticket showing the maximum weight percentage sulfur and quantity of fuel delivered.

The majority of the violations listed above stem from the Company's failure to keep records, as required by the Permit, on a consistent basis. Records must be maintained to determine compliance with substantive requirements. DES requests that the Company comply with all future recordkeeping and reporting obligations contained in the Permit.

In the event that the Company fails to resolve the deficiencies above and within the time periods indicated, DES may initiate further action against the Company, including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Mary Ruel, at the following address:

NHDES Air Resources Division  
Compliance Bureau  
29 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

Please feel free to contact DES should you have any questions regarding compliance with Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution, and the requirements of your current permit. A current copy of the rules can be obtained from the DES website at [www.des.state.nh.us/Rules/air.htm](http://www.des.state.nh.us/Rules/air.htm), or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, please contact Mary Ruel at (603) 271-6795.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Monroe', with a large, stylized 'C' or 'O' at the beginning.

Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

cc: R. Kurowski, EPA Region 1  
G. Hamel, DES Legal Unit  
B. Dorfschmidt, NHDES  
AFS #3300990100